

LITE DEPALMA GREENBERG, LLC

Bruce D. Greenberg
570 Broad Street, Suite 1201
Newark, NJ 07102

POMERANTZ LLP

Jeremy A. Lieberman
Murielle J. Steven Walsh
600 Third Avenue, 20th Floor
New York, NY 10016

Attorneys for Lead Plaintiff Warren H. Schuler

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

WARREN H. SCHULER, Individually
and On Behalf of All Others Similarly
Situating,

Plaintiff,

v.

THE MEDICINES COMPANY,
CLIVE A. MEANWELL,
GLENN P. SBLENDORIO, and
PAUL M. ANTINORI,

Defendants.

Civil Action No.: 14-1149 (CCC)(MF)

**NOTICE OF MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Return Date: March 21, 2016

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that on March 21, 2016 at 10 A.M. (or as soon thereafter as counsel may be heard), Lead Plaintiff Warren H. Schuler will and hereby does make an unopposed motion for preliminary approval of the proposed settlement set forth in the Stipulation of Settlement dated February 12, 2016.

Lead Plaintiff's motion seeks an order (1) granting preliminary approval of the proposed settlement as set forth in the Stipulation (the "Settlement"); (2) preliminarily certifying a class, for settlement purposes only, of all persons who purchased or otherwise acquired MDCO securities between January 8, 2013 and February 12, 2014, both dates inclusive; (3) appointing Epiq Systems, Inc. as Claims Administrator; (4) approving the form and manner of disseminating notice to the Class; (5) scheduling a hearing to consider final approval of the Settlement and an award of attorneys' fees and expenses; and (6) setting deadlines for the dissemination of notice, the submission of proofs of claim and requests for exclusion, and filing of papers in connection with approval of the Settlement.

Plaintiffs' motion is based on the accompanying Memorandum of Law, the Declaration of Murielle J. Steven Walsh and exhibits thereto, the Court's file in this action, and such additional evidence or argument as may be required by the Court.

A proposed order is submitted herewith.

Dated: February 19, 2016

Respectfully submitted,
LITE DEPALMA GREENBERG, LLC

/s/ Bruce D. Greenberg
Bruce D. Greenberg
570 Broad Street, Suite 1201
Newark, NJ 07102
(973) 623-3000

POMERANTZ LLP

Jeremy A. Lieberman

Murielle J. Steven Walsh

Aatif Iqbal

600 Third Avenue, 20th Floor

New York, NY 10016

(212) 661-1100

Attorneys for Lead Plaintiff